Department of Energy Nevada Operations Office Waste Management Division

Overview of the Nevada Test Site Waste Generator Approval Process

Introduction

This information provides an overview of the requirements, terms, and conditions under which the Nevada Test Site (NTS) will accept low-level radioactive waste.

This overview is an abbreviated version defining the Generator Approval Process in the Nevada Test Site Waste Acceptance Criteria (NTSWAC), current version, and is for **informational purposes only.** Generators must comply with **all** the requirements as shown in the complete version of the NTSWAC.

The Department of Energy/Nevada Operations Office (DOE/NV) and support contractors are available to assist you in understanding or interpreting this document.

For assistance, please call:

Bechtel Nevada RWAP Coordinator Michael B. Noland: phone 702-295-0262, fax 702-295-3112.

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Acronyms

AMEM U. S. Department of Energy/Nevada Operations Office, Assistant Manager for

Environmental Management

DOE U. S. Department of Energy

DOE/HQ U. S. Department of Energy/Headquarters

DOE/NV U. S. Department of Energy/Nevada Operations Office

DOT U. S. Department of Transportation

NTS Nevada Test Site

NTSWAC Nevada Test Site Waste Acceptance Criteria, current version

RWAP Radioactive Waste Acceptance Program

WAP Waste Acceptance Package

WCPP Waste Certification Program Plan

WP Waste Profile

1.0 Approval Process

1.1 Program Development

The "approval process" is a series of steps the generator and Department of Energy/Nevada Operations Office (DOE/NV) follow resulting in the generator receiving an approval to ship waste to the Nevada Test Site (NTS). A flow chart of the approval process can be found in Appendix A of the Nevada Test Site Waste Acceptance Criteria, current version (NTSWAC).

All official interactions referenced in this section between the generator and DOE/NV should take place through the generator's appropriate oversight office. DOE/NV, Radioactive Waste Acceptance Program (RWAP) will coordinate activities relating to the generator approval process. RWAP is responsible for the development, implementation, and maintenance of the RWAP and the NTSWAC. RWAP is also responsible for providing guidance to generators.

Prior to program development, contact DOE/NV Waste Management Division (WMD) to verify that waste is acceptable at the NTS and to obtain a copy of the NTSWAC.

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1.1.3 The NTSWAC is located at the following Internet address;
http://www.nv.doe.gov/programs/envmgmt/RWAP/NTSWAC.htm
(the complete text for the sections reference below can be viewed at this address)

1.2 DOE/HQ Designation Number

If the generator believes the waste form is acceptable at the NTS and meets the NTSWAC criteria the generator will contact DOE/HQ for a designation.

1.2.1 Robert A. Campbell
301-903-7127 Phone
301-903-7168 Fax
ROBERT.CAMPBELL@em.doe.gov Internet Address

1.3 Waste Acceptance Package (WAP)

The generator is responsible for development, implementation, and maintenance of an NTSWAC compliant waste certification program. NTSWAC Section 2.0 requires the following documents to be developed and submitted to DOE/NV RWAP; the WAP consists of Waste Profile(s) (WP), Waste Certification Program Plan (WCPP), and a list of authorized certification personnel. RWAP reviews and comments on this information, which begins the Approval Process.

- 1.3.1 WCPP's shall be developed to meet Section 5.0 requirements.
- 1.3.2 WP(s) must comply with waste characterization requirements in Sections 3.0 (Waste Criteria) and 4.0 (Waste Characterization).
- 1.3.3 Authorized certification personnel shall be submitted per Section 2.1.1.3.

1.4 Program Review

RWAP will perform a facility evaluation of the generator's NTSWAC program and evaluate implementation of the program at the generator facility using Section 2.2 process.

1.4.1 For clarification purposes, approval of a generator's WCPP and Waste Certification Program does not include approval of waste streams. Waste profiles/waste streams are independently reviewed from the WCPP and approved on an individual basis.

- 1.4.2 Generator's may qualify as Low Volume Generator (LVG) if total volume to be shipped in one year does not exceed 7,067 cubic feet; Section 2.6. LVGs are conditionally exempt from the on-site facility evaluation process as described in Section 2.2.2. LVGs WAP will be reviewed by DOE/NV, with the primary focus on the characterization and traceability of each waste stream.
- 1.4.3 Upon completing the facility evaluation process, RWAP will recommend approval of the program to the DOE/NV Assistant Manager for Environmental Management (AMEM). The AMEM will provide written notification of approval to the generator; Section 2.4.
- 1.4.4 DOE/NV may suspend approval at any time if the quality of the generator's program does not meet NTSWAC; Section 2.7.

1.5 Waste Profile /Stream Approval

- 1.5.1 Generators must have an approved Waste Certification Program before a Waste Profile can be approved for shipment.
- 1.5.2 WP's must comply with waste characterization requirements in Sections 3.0 (Waste Criteria) and 4.0 (Waste Characterization).
- 1.5.3 Generators are required to develop a WP for each waste stream(s); Section 2.1.1.1.
- 1.5.4 New or revised WP's may be submitted at any time; Section 2.1.1.1.
- 1.5.5 Upon recommendation of approval from RWAP, the DOE/NV AMEM will provide written notification of approval to the generator; Section 2.4.

1.6 Facility Evaluations

- 1.6.1 Evaluations are scheduled according to periodic review requirements and generator discrepancies.
- 1.6.2 Audits are conducted on a triennial basis; annual evaluation of generator performance will be conducted to ensure conformance to requirements.
- 1.6.3 If an audit cannot be conducted within 48 months of the previous audit, DOE/NV will determine if approval will continue until an audit can be conducted.
- 1.6.4 Due to changing regulatory requirements, NTS policies, and lessons learned

through implementing the NTSWAC, any program aspect or waste stream involved in the reapproval process may be subject to a full review to ensure continued compliance. This may entail imposing additional requirements or reversing previous decisions.

1.6.5 Unannounced facility evaluations may be performed at the discretion of DOE/NV.

1.6.6 Audit

- 1.6.6.1 The audit will verify, by examination and evaluation of objective evidence, that the documented program has been adequately implemented.
- 1.6.6.2 The audit will include an on-site evaluation of NTSWAC program elements such as QA, characterization, and traceability from the point-of generation to shipment.
- 1.6.6.3 See NTSWAC Section 2.2.2.1 for complete description of audit process including Corrective Action Requests.

1.6.7 Surveillance

1.6.7.1 A surveillance will be performed to verify the effectiveness of corrective action(s) resulting form an audit or for situations such as the addition of waste streams, annual assessments, discrepancies, and remote program locations.

1.6.8 Annual Assessment

- 1.6.8.1 An annual assessment of generator performance will be conducted by RWAP to ensure conformance to requirements.
- 1.6.8.2 Annual assessments will be documented for areas such as program changes (including documentation and personnel), volume shipped, operational concerns, and review of the generator's current internal assessment. Based on the results of the annual assessment, an on-site evaluation may be necessary.